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21 *Counsel for Defendant Apple Inc.*

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 OAKLAND DIVISION

25 DONALD R. CAMERON, et al.,

26 Plaintiffs,

27 v.

28 APPLE INC.

Defendant.

No. 4:19-cv-03074-YGR

STIPULATION AND ~~[PROPOSED]~~ ORDER
[Civil L.R. 6-2]

Hon. Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Donald R. Cameron and Pure Sweat Basketball,
2 Inc. (“Developer Plaintiffs”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”), by and
3 through their respective counsel, hereby agree as follows:

4 WHEREAS, on June 10, 2022, the Court entered an Order granting final approval of
5 Developer Plaintiffs’ class action settlement with Apple (ECF No. 491);

6 WHEREAS, on July 15, 2022, the Court entered an Amended Judgement of Dismissal with
7 Prejudice as to Apple (“Amended Judgment”) (ECF No. 494);

8 WHEREAS, the Amended Judgement provides that the Parties shall file “a post-distribution
9 accounting in accordance with this District’s Procedural Guidance for Class Action Settlements no
10 later than October 28, 2022” and sets “a compliance deadline on October 21, 2022 on the Court’s
11 9:01 a.m. calendar to verify timely filing of the post-distribution accounting” (ECF No. 494);

12 WHEREAS, on September 14, 2022, and pursuant to the procedures set forth in the
13 Settlement Agreement, the parties mutually accepted the Settlement Administrator’s
14 recommendation for resolving all contested settlement claims;

15 WHEREAS, in accordance with the Settlement Agreement, Apple distributed the Settlement
16 Fund to the Settlement Administrator by October 14, 2022;

17 WHEREAS, the Settlement Administrator anticipates that distributions to Settlement Class
18 Members will begin on or around October 26, 2022, with uncashed checks becoming void (“stale”)
19 on or around June 1, 2023;

20 WHEREAS, this District’s Procedural Guidance for Class Action Settlements provides that a
21 Post-Distribution Accounting be filed “[w]ithin 21 days after the settlement checks become stale,”
22 such that, despite the Parties’ diligent efforts, a Post-Distribution Accounting cannot be submitted in
23 accordance with the Procedural Guidance by the operative October 28, 2022 submission deadline;

24 THEREFORE, IT IS STIPULATED AND AGREED that the deadline for the parties to
25 submit a post-distribution accounting be extended until July 7, 2023.

26 IT IS FURTHER HEREBY STIPULATED AND AGREED that the compliance deadline to
27 verify timely filing of the post-distribution accounting be extended to the Court’s 9:01 a.m. calendar
28 on June 30, 2023.

IT IS SO STIPULATED

1 DATED: October 18, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP
Steve W. Berman

3 By: /s/ Steve W. Berman

4
5 Attorneys for Plaintiffs Donald R. Cameron and Pure
Sweat Basketball, Inc.

6 DATED: October 18, 2022

GIBSON, DUNN & CRUTCHER LLP
Caeli A. Higney

7 By: /s/ Caeli A. Higney

8 Attorneys for Defendant Apple Inc.

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10 *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

12
13 DATED: October 20, 2022

14 
15 THE HONORABLE YVONNE GONZALEZ ROGERS
16 UNITED STATES DISTRICT COURT JUDGE

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